

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

IN RE:

CASE NO.: 3:14-bk-00809-PMG

VINCENT LAWRENCE MARINO,

Debtor.

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**TRUSTEE'S APPLICATION TO EMPLOY**  
**EUGENE H. JOHNSON OF JOHNSON LAW FIRM, P.A.**  
**AS SPECIAL ATTORNEY FOR THE ESTATE**

The Application of Aaron R. Cohen, as Trustee, shows:

1. Applicant is the qualified and acting Trustee for the Estate, having been appointed pursuant to §701 of Bankruptcy Code 11 U.S.C. §701(a).
2. The estate wishes to employ Eugene H. Johnson to represent the estate in investigating and recovering transfers and any ancillary matters that may arise.
3. Applicant wishes to employ Eugene H. Johnson as attorney pursuant to Rule 2014 of the Federal Rules of Bankruptcy Procedure to prosecute the claim on behalf of the estate. The trustee has selected this attorney because he is experienced in proceedings of this type and has the knowledge and expertise to effectively and efficiently represent the estate's interests.
4. At this time the amount of the ultimate recovery to the estate is unknown, but the trustee estimates that it will be in excess of \$3,000.00.
5. The law firm is qualified within the meaning of the provisions of §327(a)-(f) of the Bankruptcy Code and is disinterested within the meaning of §101(14) of the Bankruptcy Code.
6. The law firm and the Trustee have agreed that the attorneys shall seek compensation at the firm's normal hourly rates. At the present time, the hourly rate is \$300.00.

7. The law firm understands that it must file an application for fees and reimbursement of out of pocket expenses, and that such fee application is subject to the approval of the Court pursuant to Section 330 of the Bankruptcy Code.

/s/ Aaron R. Cohen

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**AARON R. COHEN**  
Post Office Box 4218  
Jacksonville, Florida 32201  
(904) 389-7277; Fax (904) 389-7273  
Florida Bar I.D. No. 558230  
Chapter 7 Trustee

I CERTIFY that a copy has been furnished by United States Mail on this 8 day of May, 2014 to: Eugene H. Johnson, Esquire, 300 W. Adams Street, Suite 400, Jacksonville, Florida 32202; Vincent L. Marino, 3859 Paddlewheel Drive, Jacksonville, FL 32257; and by CM/ECF electronic notice to Ryan G. Moore, Atty for Debtor, and the United States Trustee.

/s/ Aaron R. Cohen

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Attorney

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
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**IN RE:**

**Case No. 14-00809-PMG**

**VINCENT LAWRENCE MARINO**

**Chapter 7**

**Debtor.**

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**DECLARATION OF SPECIAL ATTORNEY**

I, Eugene H. Johnson, Esq., declare as follows:

1. I am an attorney licensed by the State of Florida.
2. I have read the application to employ me as attorney and believe that I am qualified to represent the estate in connection with the matter described in the application.
3. I have agreed to accept employment as special attorney for the trustee. I am aware that, under §328(a), Bankruptcy Code, the trustee, with the court's approval, may employ a professional person on any reasonable terms and conditions. I am also aware, however, that notwithstanding such terms and conditions, the court must approve and award the amount of compensation and may allow compensation different from the compensation requested and that I must file a fee application with the court.
4. I am also aware, pursuant to §330(2) of the Bankruptcy Code, the court may, on its own motion or on the motion of the United States Trustee for the District or Region, the trustee for the estate, or any other party in interest, award compensation that is less than the amount of compensation that is requested.
5. I also understand that the gross proceeds recovered must be turned over to the trustee and that I must then file a fee application with the Clerk of the Bankruptcy Court; that the

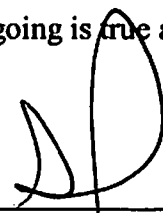
trustee will pay whatever fee the court awards after entry of an order authorizing the payment; and that, customarily, such fee applications are considered at the conclusion of the bankruptcy case.

6. I also understand that, before consummation of any settlement, it must be approved by the United States Bankruptcy Court.

7. I am a disinterested person within the meaning of 11 U.S.C. §101(14).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 29, 2014



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Eugene H. Johnson, Esq.  
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Copies to:

United States Trustee  
Aaron R. Cohen, Chapter 7 Trustee